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January 9, 2017

Krista Yacovone
Assistant Regional Counsel
Office of Regional Counsel
New Jersey Superfund Branch
U.S. Environmental Protection Agency,
Region 2
290 Broadway, 17th Floor
New York, NY 10007-1866

Re: **Request for EPA's Position Vis-à-vis the Newark Bay Complex Superfund Site**

Dear Krista:

We write on behalf of our client, Linden Property Holdings LLC ("LPH"), to request the U.S. Environmental Protection Agency's ("EPA") formal position as to the location of the Newark Bay Complex Superfund Site southern boundary. As you know, LPH is the current property owner of the property designated as Block 587, Lots 1 and 2.01, in the City of Linden, Union County, New Jersey (the "LPH Property"). The Arthur Kill is adjacent to the LPH Property.

We have attached two documents to this letter which we hope will clarify our specific questions, which are set forth below. The first map, attached as Exhibit A, was submitted by ISP Environmental Services Inc. ("IES"), the former owner of the LPH Property, to the New Jersey Department of Environmental Protection in a May 7, 2016 OffSite Remedial Investigation Report concerning the Arthur Kill. You will see that the map at Exhibit A displays IES' investigation area overview. The second map, attached as Exhibit B, is a figure extracted from the Newark Bay Complex Remedial Investigation Report, which is publicly available, and displays the Newark Bay Complex Remedial Investigation Geographic Areas. We have highlighted in black the IES investigation area in the Arthur Kill on this figure.

Our specific questions are as follows. First, the Newark Bay Complex Superfund Site is described as including the upper reaches of the Arthur Kill. Is the entire area displayed in Exhibit A (also indicated as the Arthur Kill area highlighted on Exhibit B) within the geographical boundaries of the Newark Bay Complex Superfund Site? Second, what does EPA consider the parameters of the southern extent of the Newark Bay Complex to be? We have seen some publicly available information that suggests that the Newark Bay Complex stops at the Goethals Bridge, but more recent reports (e.g., the Newark Bay Complex supplemental remedial investigation, which includes sampling adjacent to and south of the LPH Property, and the various ecological studies for the Newark Bay Complex, which include multiple areas south of the LPH Property) appear to indicate that the official boundaries of the Newark Bay Complex Superfund Site may extend as far south as the southern end of Prall's Island or beyond. Accordingly, LPH would very much appreciate a clearer understanding of EPA's formal position as to the geographical boundaries of the Newark Bay Complex Superfund Site.

Thank you very much in advance for assisting us with this inquiry and I am available to discuss via teleconference at any time should that be helpful.

All the best,

A handwritten signature in dark ink, appearing to read 'Sylvia E. Simson', written in a cursive style.

Sylvia E. Simson

EXHIBIT A

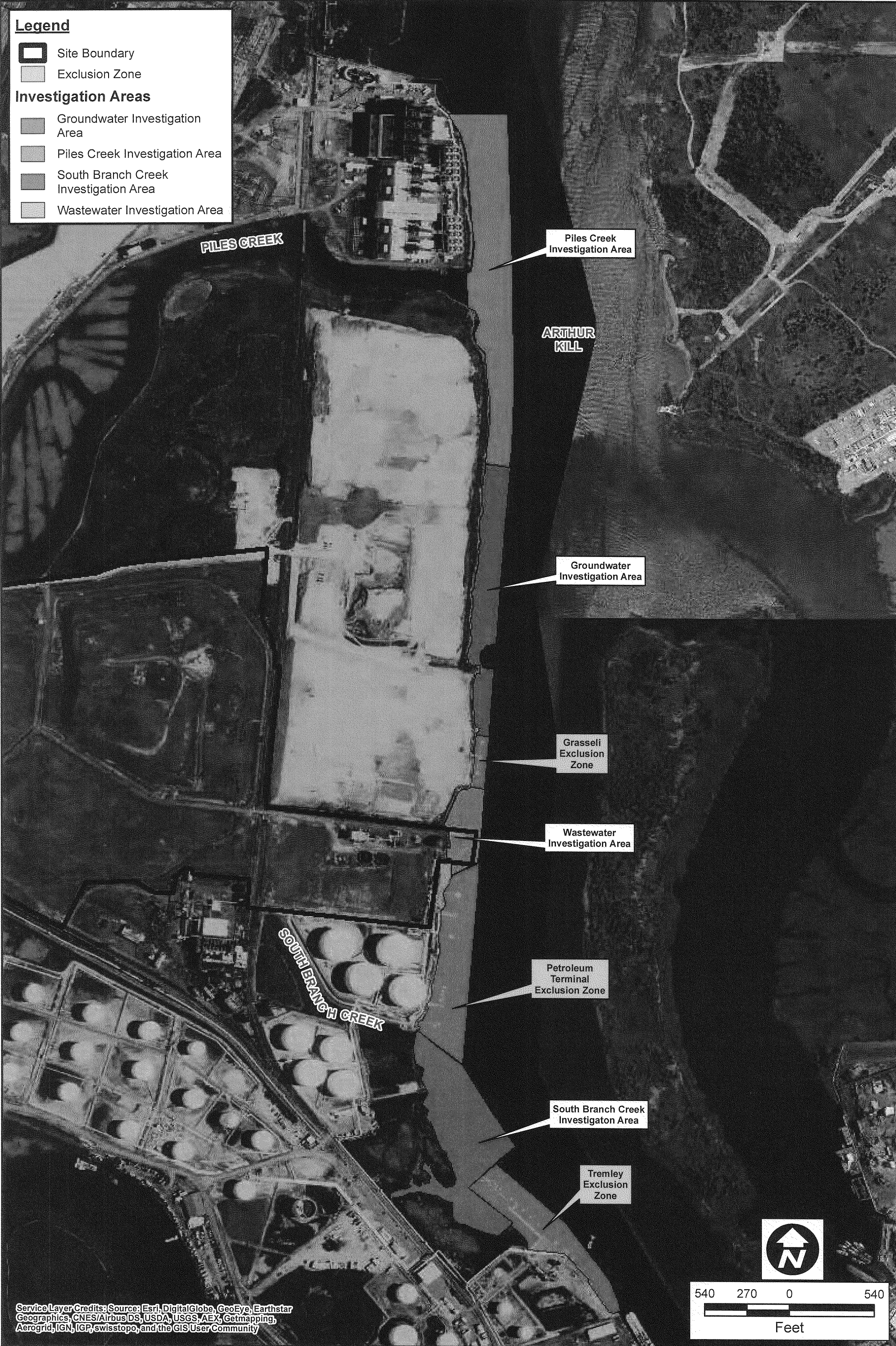


EXHIBIT B

